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UTAH DIVISION OF
SOLID & HAZARDOUS WASTE

Emerald Services, Inc.

Permit Application for Used Oil Processors and Re-Refiners

**2450 South 800 West
South Salt Lake, Utah 84119**

Submitted by:

Jim Munnell, General Manager

Your Partner for Recycling and Environmental Services

Corporate Office: 9010 E. Marginal Way So., Suite 200 • Seattle, WA 98108 • (206) 832-3000 • 1-888-832-3008 • Fax (206) 832-3030
Tacoma Office: 3401 Lincoln Avenue • Tacoma, WA 98401 • (206) 832-3018

**Permit Application for
Used Oil Processors &
Re-Refiners**

2

Map of Location & Facility

3

Analysis Plan

**Contingency Plan and Spill
Reporting Policy for Utah
Operations**

MSDS for Used Oil (RFO)

4

Closure Plan

5

**Wasatch Environmental
Tank Cleaning & Surface
Sampling Quotes**

**Central Valley Water Reclamation
Facility Draft Permit**

Emergency Services Notice Letter

ONE



STATE OF UTAH
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF SOLID AND HAZARDOUS WASTE
P.O. Box 144880, Salt Lake City, Utah 84114-4880
(801) 538-6170

Utah Division of Solid and Hazardous Waste

SEP 20 2004

IMPORTANT! Before filling out this form, please read all instructions on back.

PERMIT APPLICATION FOR USED OIL PROCESSORS AND RE-REFINERS

HAND DELIVERED

1. Company Name <u>Emerald Services, Inc.</u>	2. Owner <u>John Stephen Banchero</u>
3. Name of Contact <u>Jim Munwell</u>	4. Telephone Number <u>206-832-3000 ext. 3032</u>
5. Mailing Address <u>9010 East Marginal Way South</u> <u>Seattle Washington 98108</u>	6. \$100 Permit Fee Paid <u>\$150</u> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
7. Facility Address <u>2450 South 800 West</u> <u>South Salt Lake, Utah 84119</u>	\$50 Handler Certificate Fee Paid Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
8. EPA ID Number <u>UTR 000008021</u>	9. Permit Number (State Use Only) <u>UDP-0090</u>

10. GRADES OF OIL TO BE PRODUCED See Attached

11. AVERAGE DAILY THROUGHPUT See Attached GALLONS

AVERAGE YEARLY THROUGHPUT See Attached GALLONS

12. METHODS OF DISPOSING OF ANY WASTE BY-PRODUCTS See Attached

R315-15-13.5 requires that the following information also be included with the permit application:

- A. Map(s) of the facility.
- B. Type of containment and volume, including type and number of storage vessels to be used.
- C. Status of business, zoning, and other applicable licenses and permits if required by federal, state, and local government entities.
- D. An emergency spill containment plan.
- E. Proof of liability insurance or other means of financial responsibility for liabilities that may be incurred in collecting, transporting, or storing used oil.
- F. Proof of and amount of reclamation surety for any facility used in conjunction with transportation or storage of used oil.
- G. A closure plan meeting the requirements of R315-15-11.
- H. Analysis plan that meets the requirements as found in R315-15-5.6

I hereby certify that the foregoing is true and correct

Name Jim Munwell Title General Manager
Signature [Signature] Date September 7, 2004



STATE OF UTAH
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF SOLID AND HAZARDOUS WASTE
P.O. Box 144880, Salt Lake City, Utah 84114-4880
(801) 538-6170

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PERMIT APPLICATION FOR USED OIL PROCESSORS AND RE-REFINERS

1. Company Name <u>Emerald Services, Inc.</u>	2. Owner <u>John Stephan Banchero</u>
3. Name of Contact <u>Jim Munnell</u>	4. Telephone Number <u>206-832-3000 ext 3032</u>
5. Mailing Address <u>9010 East Marginal Way, South Sea, Wa98108</u>	6. \$100 Permit Fee Paid Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>
7. Facility Address <u>2450 South 800 West, South Salt Lake, Ut</u>	\$50 Handler Certificate Fee Paid Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>
8. EPA ID Number <u>UTR 000008021</u>	9. Permit Number (State Use Only)

10. GRADES OF OIL TO BE PRODUCED See attached.

11. AVERAGE DAILY THROUGHPUT _____ GALLONS

AVERAGE YEARLY THROUGHPUT _____ GALLONS

12. METHODS OF DISPOSING OF ANY WASTE BY-PRODUCTS _____

R315-15-13.5 requires that the following information also be included with the permit application:

- A. Map(s) of the facility.
- B. Type of containment and volume, including type and number of storage vessels to be used.
- C. Status of business, zoning, and other applicable licenses and permits if required by federal, state, and local government entities.
- D. An emergency spill containment plan.
- E. Proof of liability insurance or other means of financial responsibility for liabilities that may be incurred in collecting, transporting, or storing used oil.
- F. Proof of and amount of reclamation surety for any facility used in conjunction with transportation or storage of used oil.
- G. A closure plan meeting the requirements of R315-15-11.
- H. Analysis plan that meets the requirements as found in R315-15-5.6

I hereby certify that the foregoing is true and correct

Name Jim Munnell

Title General Manager

Signature *Jim Munnell*

Date September 7, 2004

- C. **Status of business, zoning licenses and permits:** The zoning for the property is Light Industrial (17.38.020JJ of the City of South Salt Lake zoning code). Business license has been approved, #002747. Copy has been included. Water discharge permit has been applied for with Central Valley Water Reclamation Facility and a draft permit has been received.
- D. **Emergency Spill Containment Plan:** See attached document (Contingency Plan)
- E. **Certificate of Liability Insurance:** See attached
- F. **Proof of and amount of reclamation surety:** Letter of Credit will be sent
- G. **Closure Plan:** See attached document
- H. **Analysis Plan:** See attached document

NOTICE:
THIS LICENSE MUST BE POSTED
IN A CONSPICUOUS PLACE.

CITY OF SOUTH SALT LAKE

220 E Morris Ave
South Salt Lake, UT 84115

LICENSE NO.: 002747

DATE ISSUED: 6/29/2004

BUSINESS LICENSE

The below named person or firm is hereby granted a license to
do business in South Salt Lake, Utah, subject to provisions of
City Codes, and applicable state or federal regulations.

EXPIRATION DATE: 6/30/2005

OWNER: EMERALD SERVICES, INC

BUSINESS LOCATION: 2450 S 800 W

BUSINESS DESCRIPTION: PROCESSING/TREATMENT/STORAGE
OF USED OIL

NAME: EMERALD SERVICES, INC
TO: EMERALD SERVICES, INC
2450 S 800 W
SSL UT 84119

THIS LICENSE IS NOT TRANSFERABLE


Business License Official

ACORD. CERTIFICATE OF LIABILITY INSURANCE		OP ID JM EMESE-1	DATE (MM/DD/YYYY) 09/08/04
PRODUCER Hall-Conway-Jackson, Inc. P.O. Box 8010 Mill Creek WA 98082-8010 Phone: 425-368-1200 Fax: 425-368-1290		THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.	
INSURED Emerald Services, Inc. 9010 East Marginal Way S. #200 Seattle, WA 98108		INSURERS AFFORDING COVERAGE	NAIC #
		INSURER A: Greenwich Ins Co	
		INSURER B: Ins Co of the St. of Pennsylv	
		INSURER C:	
		INSURER D:	
		INSURER E:	

COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.							
INSR ADD'L TR INSR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS		
A	GENERAL LIABILITY	GEC0000653-04	01/15/04	01/15/05	EACH OCCURRENCE	\$ 1,000,000	
	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY				DAMAGE TO RENTED PREMISES (Ea occurrence)	\$ 100,000	
	<input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR				MED EXP (Any one person)	\$ 5,000	
	<input checked="" type="checkbox"/> \$5,000 Deductible				PERSONAL & ADV INJURY	\$ 1,000,000	
	GEN'L AGGREGATE LIMIT APPLIES PER:				GENERAL AGGREGATE	\$ 2,000,000	
	<input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC				PRODUCTS - COMP/OP AGG	\$ 2,000,000	
A	AUTOMOBILE LIABILITY	AEC0000654-04	01/15/04	01/15/05	COMBINED SINGLE LIMIT (Ea accident)	\$ 1,000,000	
	<input checked="" type="checkbox"/> ANY AUTO				BODILY INJURY (Per person)	\$	
	<input type="checkbox"/> ALL OWNED AUTOS				BODILY INJURY (Per accident)	\$	
	<input type="checkbox"/> SCHEDULED AUTOS				PROPERTY DAMAGE (Per accident)	\$	
	<input checked="" type="checkbox"/> HIRED AUTOS				AUTO ONLY - EA ACCIDENT	\$	
	<input checked="" type="checkbox"/> NON-OWNED AUTOS				OTHER THAN EA ACC AGG	\$	
B	EXCESS/UMBRELLA LIABILITY	4 3048442	01/15/04	01/15/05	EACH OCCURRENCE	\$ 5,000,000	
	<input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE				AGGREGATE	\$ 5,000,000	
	<input type="checkbox"/> DEDUCTIBLE					\$	
	<input checked="" type="checkbox"/> RETENTION \$25,000					\$	
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY				WC STATUTORY LIMITS	\$	
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below				E.L. EACH ACCIDENT	\$	
A	Contractors Pollution	PEC0000655-04	01/15/04	01/15/05	E.L. DISEASE - EA EMPLOYEE	\$	
					E.L. DISEASE - POLICY LIMIT	\$	
					\$5,000,000		
					\$25,000 SIR		

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS

Re: 2454 S. 800 W., Salt Lake City, UT 84119

CERTIFICATE HOLDER

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 45 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Thomas F. Jackson

ACORD CERTIFICATE OF LIABILITY INSURANCE		OP ID JM EMESE-1	DATE (MM/DD/YYYY) 09/08/04
PRODUCER Hall-Conway-Jackson, Inc. P.O. Box 8010 Mill Creek WA 98082-8010 Phone: 425-368-1200 Fax: 425-368-1290		THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.	
INSURED Emerald Services, Inc. 9010 E. Marginal Way S. #200 Seattle, WA 98108		INSURERS AFFORDING COVERAGE INSURER A: Arch Specialty Ins. Co. INSURER B: INSURER C: INSURER D: INSURER E:	NAIC #

COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR ADD'L	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
	GENERAL LIABILITY <input type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PROJ. <input type="checkbox"/> LOC				EACH OCCURRENCE \$ DAMAGE TO RENTED PREMISES (Ea occurrence) \$ MED EXP (Any one person) \$ PERSONAL & ADV INJURY \$ GENERAL AGGREGATE \$ PRODUCTS - COMP/OP AGG \$
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS				COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
	GARAGE LIABILITY <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN EA ACC \$ AUTO ONLY: AGG \$
	EXCESS/UMBRELLA LIABILITY <input type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> DEDUCTIBLE <input type="checkbox"/> RETENTION \$				EACH OCCURRENCE \$ AGGREGATE \$ \$ \$ \$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below OTHER				WC STATU- TORY LIMITS OTH- ER E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$
A	Excess Umbrella	72UXP1467500	01/15/04	01/15/05	5,000,000 Excess of 5,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS

Re: 2454 S. 800 W., Salt Lake City, UT 84119

CERTIFICATE HOLDER

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AUTHORIZED REPRESENTATIVE

Thomas F. Jackson

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INSURED Emerald Services, Inc 9010 East Marginal Way S. #200 Seattle, WA 98108		INSURERS AFFORDING COVERAGE INSURER A: Greenwich Ins Co INSURER B: INSURER C: INSURER D: INSURER E:	NAIC #

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	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS				COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
	GARAGE LIABILITY <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN EA ACC \$ AUTO ONLY: AGG \$
	EXCESS/UMBRELLA LIABILITY <input type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE DEDUCTIBLE RETENTION \$				EACH OCCURRENCE \$ AGGREGATE \$ \$ \$ \$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below				WC STATU-TORY LIMITS <input type="checkbox"/> OTH-ER <input type="checkbox"/> E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$
A	Pollution Legal Liability	PEC0000656-04	01/15/04	01/15/05	\$5,000,000 \$50,000 SIR
DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS Re: 2454 S. 800 W., Salt Lake City, UT 84119					

CERTIFICATE HOLDER 	CANCELLATION SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL <u>45</u> DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES. AUTHORIZED REPRESENTATIVE <i>Thomas F. Jackson</i> Thomas F. Jackson
-----------------------------------	--

ACORD CERTIFICATE OF LIABILITY INSURANCEOP ID JM
EMESE-1DATE (MM/DD/YYYY)
09/08/04**PRODUCER**

Hall-Conway-Jackson, Inc.
P.O. Box 8010
Mill Creek WA 98082-8010
Phone: 425-368-1200 Fax: 425-368-1290

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION
ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE
HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR
ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURED

Emerald Services, Inc.
9010 East Marginal Way S. #200
Seattle, WA 98108

INSURERS AFFORDING COVERAGE**NAIC #**

INSURER A: Commerce & Industry Ins. Co.

INSURER B:

INSURER C:

INSURER D:

INSURER E:

COVERAGES

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	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS				COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
	GARAGE LIABILITY <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN EA ACC \$ AUTO ONLY: AGG \$
	EXCESS/UMBRELLA LIABILITY <input type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE DEDUCTIBLE RETENTION \$				EACH OCCURRENCE \$ AGGREGATE \$ \$ \$ \$
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below OTHER	WC 5841547 WORKERS COMP POLICY INCLUDES USL&H	10/31/03	10/31/04	<input checked="" type="checkbox"/> WC STATU- TORY LIMITS <input type="checkbox"/> OTH- ER E.L. EACH ACCIDENT \$1,000,000 E.L. DISEASE - EA EMPLOYEE \$1,000,000 E.L. DISEASE - POLICY LIMIT \$1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS

Re: 2454 S. 800 W., Salt Lake City, UT 84119

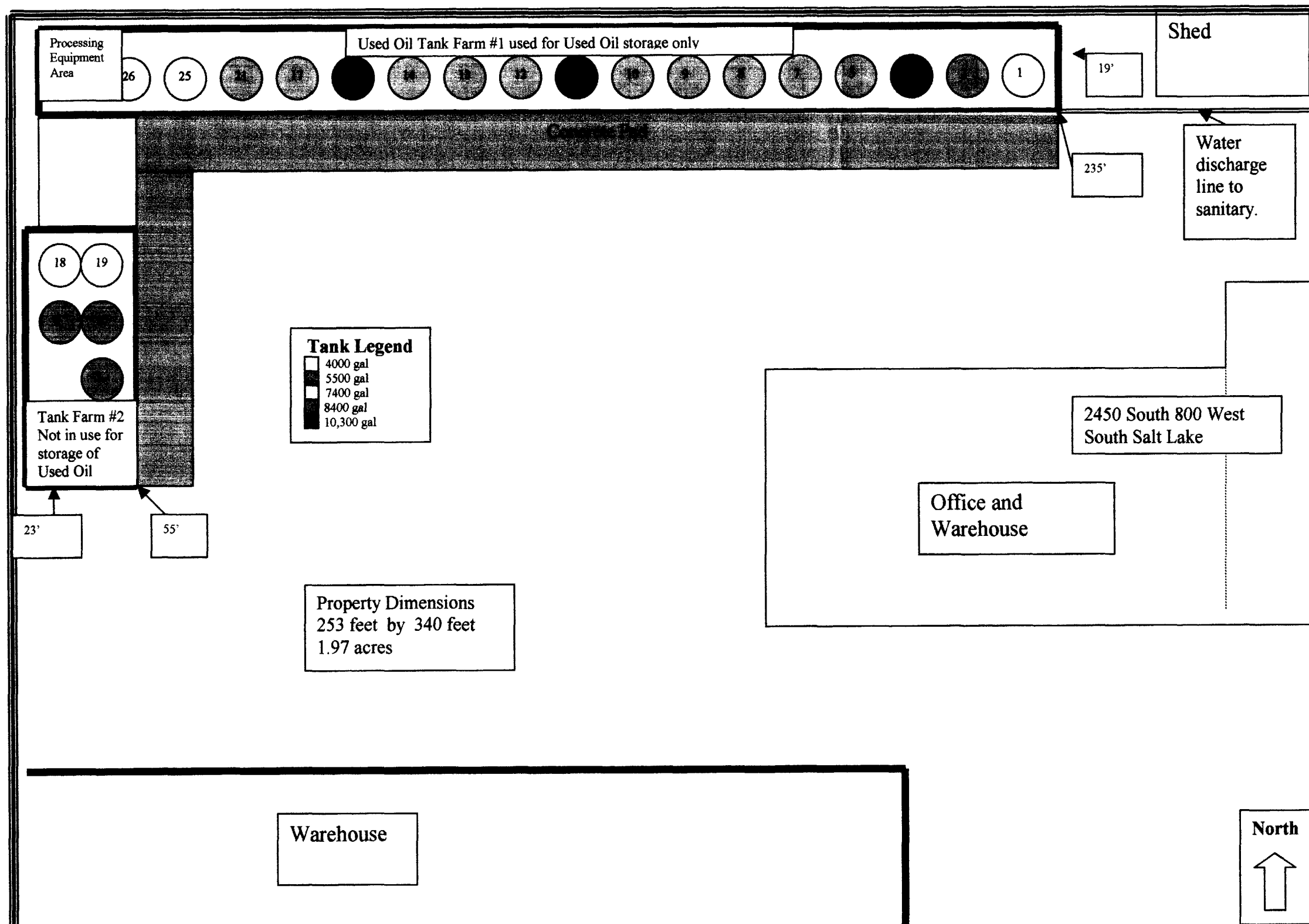
CERTIFICATE HOLDER**CANCELLATION**

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION
DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 45 DAYS WRITTEN
NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL
IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR
REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Thomas F. Jackson

TWO

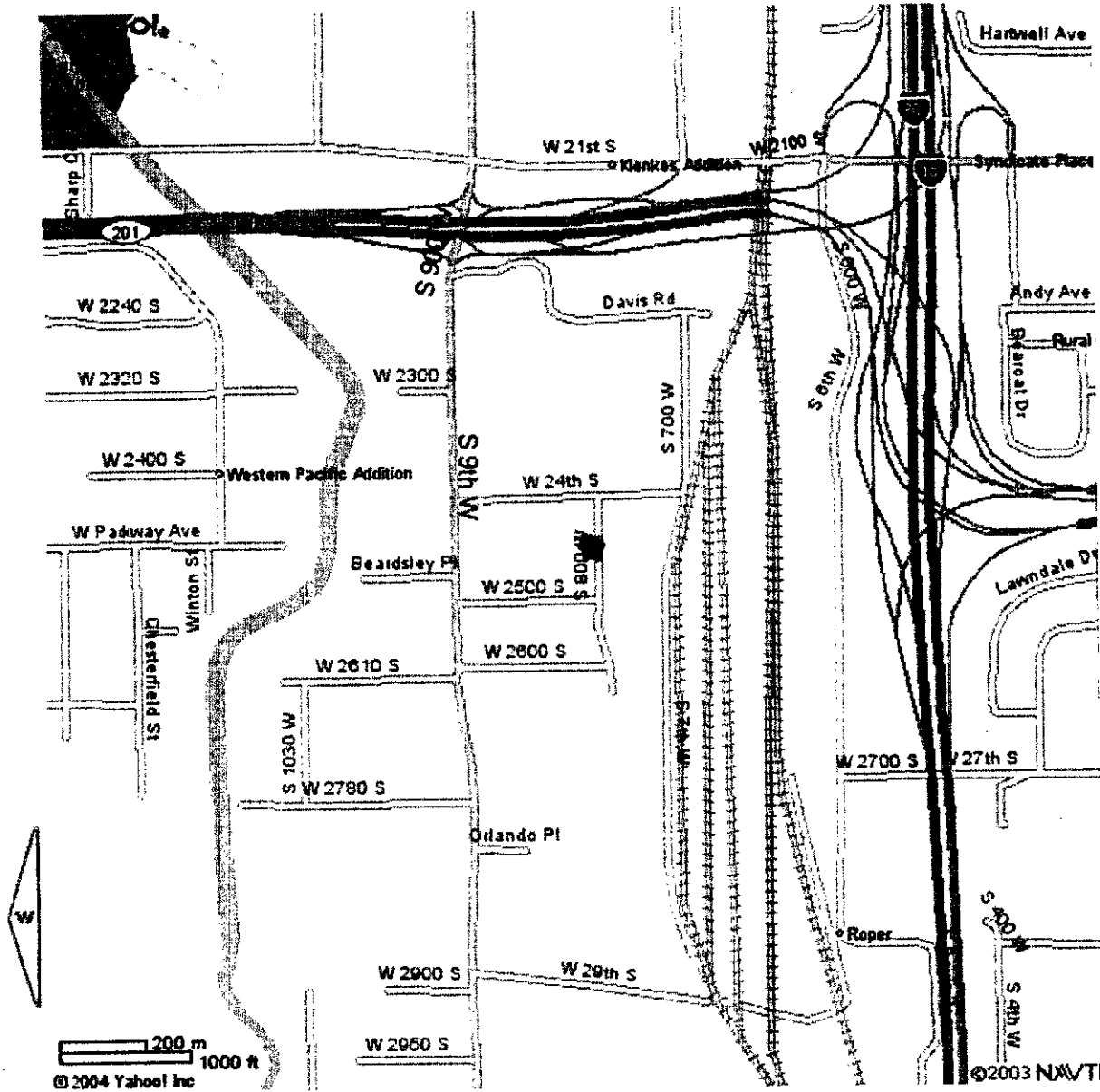


2450 S 800 W Salt Lake City, UT 84119-1510

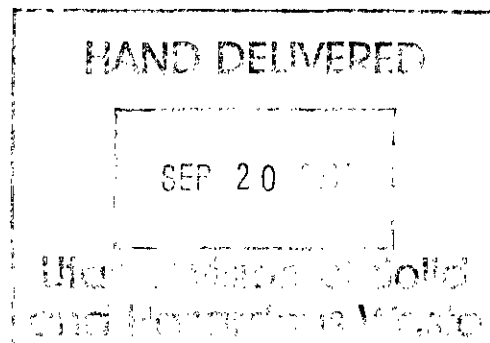
HAND DELIVERED

SEP 20 2004

Utah Division of Solid
and Hazardous Waste



THREE



USED OIL MANAGEMENT POLICY Analysis Plan

- 1.0 Subject: Used oil management guidelines
- 2.0 Group(s) Affected: All Emerald Services Personnel
- 3.0 Effective Date: 03/02/04
- 3.1 Revision Date:

Policy

A major portion of Emerald's business is focused on the collection and recycling of used oil as well as marketing of on-specification used oil. It is imperative that business decisions are made with the full intent of handling used oil properly at every stage of management. Emerald's company policies are written to follow applicable regulations and also to protect the company and the customer.

4.1 Criteria for Acceptance

By definition, used oil means, "(A) any oil that has been refined from crude oil or synthetic, used, and as a result of such use, is contaminated by physical or chemical impurities." (40 CFR 279 and WAC 173-303-515 and R315-15 of the State of Utah Standards for the Management of Used Oil).

Used oil that is to be received at Emerald Services (ES) and managed as used oil must meet the following acceptance requirements:

Requirement 1: The generator must certify, by signing the Emerald Used Oil Certification, that the used oil has not been mixed with a hazardous or dangerous waste and does not contain PCBs. Much of used oil management depends upon generator knowledge of the process of generation. If the generator cannot certify that his/her oil meets the definition of used oil, ES will not accept the load.

Requirement 2: The used oil must contain less than 1,000ppm total halogens. This determination will be made by: a) laboratory testing from an accredited laboratory prior to pick up; or, b) use of the Clor-D-Tect or comparable method by ES personnel.

Note: If a generator has used oil that has between 1,000ppm and 4,000ppm total halogens, ES's standard procedure will be to contact the customer representative and inform the generator that the oil has failed the halogen screen. The generator will be informed that further testing is required to properly designate their used oil. If the generator, through further analysis, can utilize the Rebuttable Presumption referenced in 40 CFR 279, ES will manage the used oil under off-specification requirements.



Requirement 3: The oil must contain less than 2ppm PCB's. This specification ensures that ES will not inappropriately manage PCB oil, nor will ES manage used oil that has contamination from sources other than used oil operations.

If used oil meets the above criteria, it can be managed as used oil at ES. If the material does not meet any or all of the above criteria, the material will not be managed as used oil and will be profiled to a disposal facility appropriate for the material.

4.2 Management of On-Specification Used Oil

ES will manage used oil that meets the on-specification (on-spec) requirements for used oil burned for energy recovery referenced in 40 CFR 279 and WAC 173-303-515 and R315-15 of the State of Utah Standards for the Management of Used Oil. ES will reference a certification and laboratory analysis from an accredited laboratory that certifies the sale oil meets the standards for on-spec used oil as defined in WAC 173-303-515(4) and R315-15 of the State of Utah Standards for the Management of Used Oil. Laboratory testing will be as follows:

Arsenic	≤ 5ppm by EPA 200.7
Cadmium	≤ 2ppm by EPA 200.7
Chromium	≤ 10ppm by EPA 200.7
Lead	≤ 100ppm by EPA 200.7
Flashpoint	≥ 100°F
Total HOC's	< 1000ppm by Clor-D-Tect
PCB's	<2.0ppm by EPA 8080

Each analysis report will be labeled as a batch number.

ES will reference the laboratory analysis number on the bill of lading, which will be provided to the buyer for each load that is sold as on-spec used oil.

Laboratory analysis will be retained for 3 years.

4.3 Sampling

Each tank will be sampled with the use of a calawosa tube from the top of the tank in order to collect a composite sample of one tank. Once a sample has been pulled the tank will be locked out with a tag pending results. Once the oil is considered on-specification used oil, the tank will be completely emptied before any other oil is placed in the tank.

4.4 Management of Off-specification Used Oil

All used oil that does not meet the on-spec requirements for used oil burned for energy recovery in 40 CFR 279 and WAC 173-303-515 and R315-15 of the State of Utah Standards for the Management of Used Oil will be shipped by ES to an appropriate burner.



Prior to the sale of off-spec used oil by ES to a burner, the burner must provide ES with a signed notice stating that they have notified EPA and Ecology of the location and general description of their used oil activity. The notice to EPA and Ecology must state that the burner will only burn the used oil in an allowable furnace or boiler identified in 40 CFR Part 279.61(a). ES will retain each notice for a period of three years from the sale of used oil by ES to a burner. The burner must provide ES with a signed notice before the burner receives a shipment from ES.

Burners who have already notified EPA and Ecology of their activities prior to the effective date of 40 CFR Part 279 does not need to re-notify.

4.5 Recordkeeping

All records of analytical testing, transportation and sale of used oil will be retained for a period of not less than three (3) years.

All records of each shipment shall include:

- Name and address of the facility receiving the shipment.
- The quantity of the each shipment.
- Copy of the analysis verifying the used oil meets the on-specification standards as defined under R315-15 of the State of Utah Standards for the Management of Used Oil.

3.7.6 CONTINGENCY PLAN AND SPILL REPORTING POLICY FOR UTAH OPERATIONS

- 1.0 Subject:** Contingency Plan and Spill Reporting Procedures
- 2.0 Group(s) Affected:** All Emerald Services Personnel
- 3.0 Effective Date:** 11/22/02
- 3.1 Revision Dates:** 11/26/02
03/24/03
12/29/03
2/27/03
8/26/04

4.0 Policy

1. All spills at the facility or off-site must be reported to designated spill response supervisory personnel (Emergency Coordinators) immediately after spill has been stabilized. Emergency Coordinators must gather all information as required in part 4.1.2 of this Section. Emergency Coordinators will then immediately report all information to the Environmental, Health and Safety (E,H,&S) Department (See notification call list). The E,H&S Department, if required by R315-15-9(b), will notify the Utah Department of Environmental Quality as stated in 4.1.3 of this Section.

Caution: No spill should be considered too small to report to supervisory personnel. Any spill of one (1) gallon or greater on facility premises must be reported. Any quantity regardless of size must be reported if it occurs off facility property.

2. To comply with regulatory requirements, the following information must be reported by the responsible parties who were involved with the spill:
 - a. Type of chemical
 - b. Location, Date, Time, and Quantity
 - c. Persons at scene
 - d. Cause of Release
 - e. Clean-up measures in process or concluded
 - f. Bill of Lading/Shipping Paper information
 - g. Injuries, if any
 - h. Public health and environmental impact
3. Responsible personnel must fill out report form and forward the form to their Supervisor by the end of the shift.

4. A meeting must be arranged within 24 hrs between the supervisor, the responsible party and a member of the E,H,&S Department to discuss the incident.

Without this basic information, environmental staff cannot properly and completely meet reporting requirements to regulatory agencies under RCRA, DOT, HMTA, WAC, TSCA, OSHA, CERCLA/SARA, CWA, or CAA.

4.1 Response Procedure

4.1.1 Immediate action by responsible on-scene personnel

In the event of a release of used oil, the person responsible for the material at the time of release shall immediately:

1. Notify law enforcement officials, fire officials, and summon medical assistance as necessary by dialing 911 from any phone.
2. If you must leave the scene to make calls, return to the scene as quickly as possible. Keep the Bill of Lading on your person and ensure that you are readily available to fire and law enforcement officials upon their arrival. If danger to the public exists, remain at the scene and request that another party make the necessary calls.
3. Render first aid or medical assistance to yourself or others as necessary.
4. Safeguard yourself and others. Everyone must be clear of the area, with the exception of law enforcement officials. Assist law enforcement and fire officials if requested.
5. Take appropriate action to minimize the threat to human health and the environment. Set up controls to minimize and prevent further incidents. If it is possible to accomplish without risk, stop the leak to reduce clean-up measures (use rags, extra clothing, etc.)
6. Use sand, dirt, or other material in the vicinity to restrict the contaminated spill area or dig a drainage trench to contain the spilled material.
7. Remain at the scene and remain available until the emergency is declared "over" and you are released by both law enforcement and fire officials.

4.1.2 Immediate action by Emergency Coordinators

1. Emergency Coordinators must immediately gather the following information from the responsible on-scene person.
 - a. Name, phone and address of person responsible for release
 - b. Name, title and phone number of person reporting release.
 - c. Time and date of release
 - d. Location of release—as specific as possible including the nearest town, city, highway or waterway.
 - e. Description contained on the manifest and the amount of material released
 - f. Cause of release
 - g. Possible hazards to human health or the environment and emergency action taken to minimize threat.
 - h. The extent of injuries, if any.
2. Immediately report all information to the E,H&S Department.

4.1.3 Immediate action by the Environmental, Health and Safety Department

The E,H&S Department will then contact the necessary governmental agencies to fulfill regulatory reporting requirements and ensure that all action requested by regulatory agencies must be performed as soon as possible.

1. The E,H&S Department will notify the Utah Department of Environmental Quality, 24-hr answering services, **801-536-4123** for used oil releases exceeding 25-gallons, or from smaller releases that pose a potential threat to human health or the environment including but not limited to: spills nearby or into surface water, storm or sewer systems. Small leaks and drips from vehicles are considered de minimis and are not subject to the release clean-up provisions of R315-15-9.
2. Emerald Services E,H&S personnel will provide the following information when reporting the release:

- a. Name, phone, and address of person responsible for release.
 - b. Name, title, and phone number of person reporting release.
 - c. Time and date of release.
 - d. Location of release—as specific as possible including the nearest town, city, highway, or waterway.
 - e. Description contained on the manifest and the amount of material released.
 - f. Cause of release.
 - g. Possible hazards to human health or the environment and emergency action taken to minimize threat.
 - h. The extent of injuries, if any.
3. If Emerald Services, Inc. has discharged used oil they shall:
 - a. Give notice, if required by 49 CFR 171.15 to the National Response Center, 1-800-424-8802 or 202-426-2675 and
 - b. Report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590
4. Any amount of used oil or hazardous substances discharged to navigable waters will be reported as required in 33 CFR 153.203.
5. In the event of an extreme emergency (for example: large fire, major spill, spill to surface water, major traffic accident), the E,H&S Department must contact a Qualified individual as defined under 4.5 below.

4.2 Release Clean-up Procedures

Emerald Services shall clean-up all released material and any residue or contaminated soil, water, or other material resulting from the release or take all actions as may be required by the Executive Secretary of the Utah Solid and Hazardous Waste Control Board so that the released material no longer poses a hazard to human health or the environment. The cleanup or other required actions shall be at Emerald's expense.

4.3 Spill Kits

All trucks are equipped with spill kits containing the following items:

Popup Pool (66 gallon capacity)
Oil Only Socks (3 inches wide by 12 feet long)
Disposal Bag
Repair Putty Stick
Rubber Gloves

Two Spill Kits will also be located within the tank farm area containing the following:

Overpack 85 gallon drum
One bundle of Absorbment Pads (100ct)
Four WSO-30 Oil Only Socks (3 inches wide by 12 feet long)
Disposal Bag
Rubber Gloves
Safety Glasses

Drivers and facility personal are required to notify supervisor or truck shop if they need replacement stock for the spill kits. Spill kits are mounted on the exterior of the truck.

4.4 Earthquake Response Procedure

1. Immediately shut down transferring operations.
2. Evacuate to an area away from drums or other objects that could fall from overhead.
3. After quake has ended, contact Emergency Coordinator and, if necessary, contact local authorities and render first-aid.
4. If area is safe to re-enter, perform inspection of critical inspection points. (Attachment 2)
5. If spills have occurred, follow release cleanup procedure as outlined in part 4.2 of this section.

4.5 Emergency Notification Call List

Notification to supervisory personnel of a spill or fire must be done as soon as safely possible. The responsible party is to contact their respective Emergency Coordinator and the Emergency Coordinator is to contact at least one member of the Environmental Health and Safety Department.

EMERGENCY COORDINATORS

Utah Area - Transportation Division

Emergency Coordinator

Napo Jemmings, Manager (801) 592-5319

Alternates

Brenda Jemmings (801) 592-5317

Robert Montoya
Dave Sherrill

(801) 973-4131
(801) 973-4131

Out of State, Alternate

Jim Munnell

(206) 832-3032 Cell Phone: (206) 963-0370

ENVIRONMENTAL HEALTH AND SAFETY DEPARTMENT (E,H,&S DEPARTMENT)

The Emergency Coordinator must contact one of the following individuals. Do not just leave a voicemail, you must try the next person on the list until some one is reached directly.

Sheila Smith
Kristi Whitney
Jerry Bartlett

(253) 370-7912 Cell Phone:(253) 370-7912
(206) 832-3205 Cell Phone:(253) 278-4116
(206) 832-3005 Cell Phone:(206) 713-5673

QUALIFIED INDIVIDUAL

One of the Qualified individuals must be contacted by the E,H&S Department in the event of an extreme emergency (for example: large fire, major spill, spill to surface water, major traffic accident).

Stephen Banchemo
Clue Westmoreland
Jerry Bartlett
John Brigham

(206) 948-1208
(206) 713-5680
(206) 713-5673
(206) 715-4534

FEDERAL/ STATE AGENCIES

Utah Department of Environmental Quality
U.S. Coast Guard & National Response Center
EPA Region 8 (Emergency Response)

1-801-536-4123
1-800-424-8802
1-800-227-8914

PRIMARY CONTRACTOR RESPONDER FOR RELEASE TO SURFACE WATER

Foss Environmental

1-800-337-7455

FIRE/POLICE

911

4.5 Reporting

Within 15 days after any release of used oil that is reported under R315-15-9.1(b) of the Utah Used Oil Management Rules, Emerald Services, Inc. will submit a written report to the Executive Secretary which contains the following information:

1. Emerald Services, Inc. name, address, and telephone #.

2. Date, time, location and nature of the incident
3. Chemical involved and quantity released.
4. The extent of any injuries, if occurred.
5. An assessment of actual or potential hazards to human health or the environment, where this is applicable.
6. The estimated quantity and disposition of recovered material that resulted from the incident.



ATTACHMENT 1

SPILL REPORTING FORM

Emerald Recycling
9010 E. Marginal Way S Suite 200, Seattle, WA 98108
(206) 832-3000

Date: _____ Time of Spill : _____

Address Location of Spill: _____

Responsible Party(s): _____

Type of incident (i.e., fire, explosion, spill etc.): _____

Type of material spilled: _____

Quantity and duration of spill: _____

Quantity of recovered material that resulted from the incident: _____

Health Risk: _____

Did spill reach surface water or storm drains: _____

Description of Incident: _____

Signature of Responsible Party

Date Signed

Corrective Action Taken: _____

Agencies Contacted: _____ Report #: _____

Agency Representative/Name: _____

Action Required by Agency: _____

Management Review Signature

Date Reviewed

National Response Center/U.S.C.G.
Utah Department of Environmental Quality
EPA Region 8 (Emergency Response)
Utah State Patrol

1-800-424-8802
1-801-536-4123
1-800-227-8914
801-538-3400

ATTACHMENT 2

Critical Points to be inspected after an Earthquake.

1. Visually inspect all drums secure and stable on palates. _____
2. Check for possible leaking drums. _____
3. Visually inspect all tanks. _____
4. Visually inspect all pipeline connections _____
6. Visually inspect all piping throughout the facility. _____
7. Visually inspect all containment berms for possible cracking. _____
8. Visually inspect below ground surface impoundments for possible cracks. _____
9. Visually inspect all natural gas lines. _____
10. Check for proper operation of wastewater treatment system, boilers and oil transfer computer system. _____



MATERIAL SAFETY DATA SHEET

Reprocessed Fuel Oil (RFO)

1. PRODUCT AND COMPANY IDENTIFICATION

Product Name: Reprocessed Fuel Oil (RFO)
Product Code: Multiple
Intended Use: Used oil
Chemical Family: Petroleum Hydrocarbon
Responsible Party: ConocoPhillips
P.O. Box 2197
Houston, TX
77252

For Additional MSDSs 800-762-0942

Technical Information: 918-661-1672

The intended use of this product is indicated above. If any additional use is known, please contact us at the Technical Information number listed.

EMERGENCY OVERVIEW

24 Hour Emergency Telephone Numbers:

Spill, Leak, Fire or Accident

California Poison Control System: (800) 358-3129

Call CHEMTREC

North America: (800)424-9300

Others: (703)527-3887 (collect)

Health Hazards/Precautionary Measures: Causes eye irritation. Avoid contact with eyes, skin and clothing. Wash thoroughly after handling.

Physical Hazards/Precautionary Measures: Keep away from all sources of ignition.

Appearance: Black
Physical form: Liquid
Odor: Characteristic Petroleum

NFPA Hazard Class:

Health: 1 (Slight)
Flammability: 1 (Slight)
Reactivity: 0 (Least)

HMIS Hazard Class

Health: 1* (Slight)
Flammability: 0 (Least)
Physical Hazard: 0 (Least)

*Indicates possible chronic health effects.

2. COMPOSITION/INFORMATION ON INGREDIENTS

HAZARDOUS COMPONENTS

% VOLUME

EXPOSURE GUIDELINE

Metal Sulfonate
CAS# Proprietary

0-5

<u>Limits</u>	<u>Agency</u>	<u>Type</u>
Not Established		

Zinc Compound
CAS# Proprietary

0-1 Not Established

<u>OTHER COMPONENTS</u>	<u>% VOLUME</u>	<u>EXPOSURE GUIDELINE</u>		
		<u>Limits</u>	<u>Agency</u>	<u>Type</u>
Lubricant Base Oil (Petroleum) CAS# Various	79-100	(See: Oil Mist, If Generated)		
Additives CAS# Proprietary	0-11	Not Established		

<u>REFERENCE</u>	<u>EXPOSURE GUIDELINE</u>		
	<u>Limits</u>	<u>Agency</u>	<u>Type</u>
Oil Mist, If Generated CAS# None	5 mg/m3	ACGIH	TWA
	10 mg/m3	ACGIH	STEL
	5 mg/m3	OSHA	TWA
	2500 mg/m3	NIOSH	IDLH
	5 mg/m3	NOHSC	TWA

The base oil for this product can be a mixture of any of the following highly refined petroleum streams:
CAS 64741-88-4; CAS 64741-89-5; CAS 64741-96-4; CAS 64741-97-5; CAS 64742-01-4; CAS 64742-52-5; CAS
64742-53-6; CAS 64742-54-7; CAS 64742-55-8; CAS 64742-56-9; CAS 64742-57-0; CAS 64742-62-7; CAS
64742-63-8; CAS 64742-65-0; CAS 72623-85-9; CAS 72623-86-0; CAS 72623-87-1

Note: State, local or other agencies or advisory groups may have established more stringent limits.
Consult an industrial hygienist or similar professional, or your local agencies, for further information.

1%=10,000 PPM.

All components are listed on the TSCA inventory.

3. HAZARDS IDENTIFICATION

Potential Health Effects:

Eye: Contact may cause mild eye irritation including stinging, watering, and redness.

Skin: Contact may cause mild skin irritation including redness, and a burning sensation. Prolonged or repeated contact can worsen irritation by causing drying and cracking of the skin leading to dermatitis (inflammation). No information available on skin absorption.

Inhalation (Breathing): No information available on acute toxicity. See signs and symptoms.

Ingestion (Swallowing): No information available on acute toxicity.

Signs and Symptoms: Effects of overexposure may include irritation of the nose and throat, irritation of the digestive tract, nausea and diarrhea.

Cancer: Probable cancer hazard (see Sections 11 and 15).

Target Organs: No data available for this material.

Developmental: No data available for this material.

Pre-Existing Medical Conditions: Conditions aggravated by exposure may include skin disorders.

4. FIRST AID MEASURES

Eye: If irritation or redness develops, move victim away from exposure and into fresh air. Flush eyes with clean water. If symptoms persist, seek medical attention.

Skin: Wipe material from skin and remove contaminated shoes and clothing. Cleanse affected area(s) thoroughly by washing with mild soap and water and, if necessary, a waterless skin cleanser. If irritation or redness develops and persists, seek medical attention.

Inhalation (Breathing): If respiratory symptoms develop, move victim away from source of exposure and into fresh air. If symptoms persist, seek medical attention. If victim is not breathing, clear airway and immediately begin artificial respiration. If breathing difficulties develop, oxygen should be administered by qualified personnel. Seek immediate medical attention.

Ingestion (Swallowing): If swallowed, seek medical attention. If victim is drowsy or unconscious, place on the left side with the head down. Do not give anything by mouth. If possible, do not leave victim unattended.

Note To Physicians: High-pressure hydrocarbon injection injuries may produce substantial necrosis of underlying tissue despite an innocuous appearing external wound. Often these injuries require extensive emergency surgical debridement and all injuries should be evaluated by a specialist in order to assess the extent of injury.

5. FIRE FIGHTING MEASURES

Flammable Properties: Flash Point: >170°F/>78°C (PMCC)
OSHA Flammability Class: Not applicable
LEL/UEL%: No Data
Autoignition Temperature: No Data

Unusual Fire & Explosion Hazards: This material may burn, but will not ignite readily. Vapors are heavier than air and can accumulate in low areas. If container is not properly cooled, it can rupture in the heat of a fire.

Extinguishing Media: Dry chemical, carbon dioxide, foam, or water spray is recommended. Water or foam may cause frothing of materials heated above 212°F. Carbon dioxide can displace oxygen. Use caution when applying carbon dioxide in confined spaces.

Fire Fighting Instructions: For fires beyond the incipient stage, emergency responders in the immediate hazard area should wear bunker gear. When the potential chemical hazard is unknown, in enclosed or confined spaces, or when explicitly required by DOT, a self contained breathing apparatus should be worn. In addition, wear other appropriate protective equipment as conditions warrant (see Section 8).

Isolate immediate hazard area, keep unauthorized personnel out. Stop spill/release if it can be done with minimal risk. Move undamaged containers from immediate hazard area if it can be done with minimal risk.

Water spray may be useful in minimizing or dispersing vapors and to protect personnel. Cool equipment exposed to fire with water, if it can be done with minimal risk. Avoid spreading burning liquid with water used for cooling purposes.

6. ACCIDENTAL RELEASE MEASURES

This material may burn, but will not ignite readily. Keep all sources of ignition away from spill/release. Stay upwind and away from spill/release. Notify persons down wind of the spill/release, isolate immediate hazard area

and keep unauthorized personnel out. Stop spill/release if it can be done with minimal risk. Wear appropriate protective equipment including respiratory protection as conditions warrant (see Section 8).

Prevent spilled material from entering sewers, storm drains, other unauthorized drainage systems, and natural waterways. Dike far ahead of spill for later recovery or disposal. Spilled material may be absorbed into an appropriate absorbent material.

Notify fire authorities and appropriate federal, state, and local agencies. Immediate cleanup of any spill is recommended. If spill of any amount is made into or upon navigable waters, the contiguous zone, or adjoining shorelines, notify the National Response Center (phone number 800-424-8802).

7. HANDLING AND STORAGE

Handling: Do not enter confined spaces such as tanks or pits without following proper entry procedures such as ASTM D-4276 and 29CFR 1910.146. The use of appropriate respiratory protection is advised when concentrations exceed any established exposure limits (see Sections 2 and 8).

Do not wear contaminated clothing or shoes. Use good personal hygiene practices.

High pressure injection of hydrocarbon fuels, hydraulic oils or greases under the skin may have serious consequences even though no symptoms or injury may be apparent. This can happen accidentally when using high pressure equipment such as high pressure grease guns, fuel injection apparatus or from pinhole leaks in tubing of high pressure hydraulic oil equipment.

"Empty" containers retain residue and may be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, or other sources of ignition. They may explode and cause injury or death. "Empty" drums should be completely drained, properly bunged, and promptly shipped to the supplier or a drum reconditioner. All containers should be disposed of in an environmentally safe manner and in accordance with governmental regulations.

Before working on or in tanks which contain or have contained this material, refer to OSHA regulations, ANSI Z49.1 and other references pertaining to cleaning, repairing, welding, or other contemplated operations.

Storage: Keep container(s) tightly closed. Use and store this material in cool, dry, well-ventilated areas away from heat and all sources of ignition. Storage temperatures above 113°F may lead to thermal decomposition, resulting in the generation of hydrogen sulfide and other sulfur containing gases. Store only in approved containers. Keep away from any incompatible material (see Section 10). Protect container(s) against physical damage.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Engineering controls: If current ventilation practices are not adequate to maintain airborne concentrations below the established exposure limits (see Section 2), additional engineering controls may be required.

Personal Protective Equipment (PPE):

Respiratory: A NIOSH certified air purifying respirator with a Type 95 (R or P) particulate filter may be used under conditions where airborne concentrations are expected to exceed exposure limits (see Section 2).

Protection provided by air purifying respirators is limited (see manufacturer's respirator selection guide). Use a NIOSH approved self-contained breathing apparatus (SCBA) or equivalent operated in a pressure demand or other positive pressure mode if there is potential for an uncontrolled release, exposure levels are not known, or any other circumstances where air purifying respirators may not provide adequate protection. A respiratory protection program that meets OSHA's 29 CFR 1910.134 and ANSI Z88.2 requirements must be followed whenever workplace conditions warrant a respirator's use.

Skin: The use of gloves impervious to the specific material handled is advised to prevent skin contact and possible irritation (see manufacturers literature for information on permeability).

Eye/Face: Approved eye protection to safeguard against potential eye contact, irritation, or injury is recommended. Depending on conditions of use, a face shield may be necessary.

Other Protective Equipment: A source of clean water should be available in the work area for flushing eyes and skin. Impervious clothing should be worn as needed.

Suggestions for the use of specific protective materials are based on readily available published data. Users should check with specific manufacturers to confirm the performance of their products.

9. PHYSICAL AND CHEMICAL PROPERTIES

Note: Unless otherwise stated, values are determined at 20°C (68°F) and 760 mm Hg (1 atm).

Appearance: Black

Physical State: Liquid

Odor: Characteristic Petroleum

pH: Not applicable

Vapor Pressure (mm Hg): <1

Vapor Density (air=1): >1

Boiling Point/Range: 275-960°F / 135-516°C

Freezing/Melting Point: No Data

Solubility in Water: Negligible

Specific Gravity: 0.89-0.92

Percent Volatile: Negligible

Evaporation Rate (nBuAc=1): <1

Viscosity: 95 cSt @ 40°C

Bulk Density: 7.42 lbs/gal

Flash Point: >170°F / >78°C (PMCC)

Flammable/Explosive Limits (%): No Data

10. STABILITY AND REACTIVITY

Stability: Stable under normal ambient and anticipated storage and handling conditions of temperature and pressure.

Conditions To Avoid: Extended exposure to high temperatures can cause decomposition.

Materials to Avoid (Incompatible Materials): Avoid contact with strong oxidizing agents.

Hazardous Decomposition Products: Combustion can yield carbon, nitrogen, sulfur, phosphorus, and zinc oxides.

Hazardous Polymerization: Will not occur.

11. TOXICOLOGICAL INFORMATION

Lubricant Base Oil (Petroleum) (CAS# Various)

Carcinogenicity: The petroleum base oils contained in this product have been highly refined by a variety of processes including solvent extraction, hydrotreating, and dewaxing to remove aromatics and improve performance characteristics. None of the oils used are listed as a carcinogen by NTP, IARC, or OSHA.

Metal Sulfonate (CAS# Proprietary)

Target Organ(s): The metal sulfonate used in this product produced skin sensitization in guinea pigs. However, human patch testing in lubricant base oils did not cause allergic skin reactions at concentrations below 10%.

12. ECOLOGICAL INFORMATION

Not evaluated at this time

13. DISPOSAL CONSIDERATIONS

This material, because of its intended use, has become used oil due to contamination by physical or chemical impurities. RECYCLE ALL USED OIL. While being recycled, used oil is regulated by 40 CFR 279. Use resulting in chemical or physical change or contamination may also subject it to regulation as hazardous waste. Under federal regulations, used oil is a solid waste managed under 40 CFR 279. However, in California, used oil is managed as hazardous waste until tested to show it is not hazardous. Consult state and local regulations regarding the proper handling of used oil. In the case of used oil, the intent to discard it may cause the used oil to be regulated as hazardous waste.

Contents should be completely used and containers emptied prior to discard. Rinsate may be considered a RCRA hazardous waste and must be disposed of with care and in compliance with federal, state and local regulations. Large empty containers, such as drums, should be returned to the distributor or a drum reconditioner. To assure proper disposal of small empty containers, consult with state and local regulations and disposal authorities.

14. TRANSPORT INFORMATION

DOT Shipping Description: Not classified as hazardous

15. REGULATORY INFORMATION

EPA SARA 311/312 (Title III Hazard Categories):

Acute Health: Yes
Chronic Health: Yes
Fire Hazard: No
Pressure Hazard: No
Reactive Hazard: No

SARA 313 and 40 CFR 372:

This material contains the following chemicals subject to the reporting requirements of SARA 313 and 40 CFR 372:

Component	CAS Number	Weight %
Zinc Compound	Proprietary	0-1

California Proposition 65:

Warning: This material contains the following chemicals which are known to the State of California to cause cancer, birth defects or other reproductive harm, and are subject to the requirements of California Proposition 65 (CA Health & Safety Code Section 25249.5):

Component	Effect
Used engine oil	is on the Proposition 65 list of chemicals known to the State of California to cause cancer.

Carcinogen Identification:

Used motor oil has been identified as a possible skin carcinogen by IARC.

EPA (CERCLA) Reportable Quantity:

--None--

16. OTHER INFORMATION

Issue Date: 01/28/03

Previous Issue Date: 01/01/02

Product Code: Multiple

Revised Sections: 1, 2, 3, 4, 5, 7, 8, 14, 16

Previous Product Code: Multiple

MSDS Number: 724300

Status: Final

Disclaimer of Expressed and Implied Warranties:

The information presented in this Material Safety Data Sheet is based on data believed to be accurate as of the date this Material Safety Data Sheet was prepared. **HOWEVER, NO WARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PARTICULAR PURPOSE, OR ANY OTHER WARRANTY IS EXPRESSED OR IS TO BE IMPLIED REGARDING THE ACCURACY OR COMPLETENESS OF THE INFORMATION PROVIDED ABOVE, THE RESULTS TO BE OBTAINED FROM THE USE OF THIS INFORMATION OR THE PRODUCT, THE SAFETY OF THIS PRODUCT, OR THE HAZARDS RELATED TO ITS USE.** No responsibility is assumed for any damage or injury resulting from abnormal use or from any failure to adhere to recommended practices. The information provided above, and the product, are furnished on the condition that the person receiving them shall make their own determination as to the suitability of the product for their particular purpose and on the condition that they assume the risk of their use. In addition, no authorization is given nor implied to practice any patented invention without a license.

FOUR



Closure Plan

Last printed: 9/7/04

1. INTRODUCTION

R315-15-11

This Closure Plan specifies performance standards and describes procedures for closure of the used oil processing facility and its equipment including all ancillary units, containers, tanks and piping (referred to herein as "permitted units") at the Emerald Services, Inc. (Emerald) used oil processing and transfer facility located at 2450 South 800 West South Salt Lake City, Utah 84119. The purpose of this Closure Plan is to describe the anticipated procedures, decontamination techniques, and timelines involved in the closure activities.

Emerald intends to close the facility and its units by removing all waste and waste residues; therefore, a Post-Closure Plan is not provided. However, if closure in accordance with the Closure Plan is not possible, the Closure Plan will be amended accordingly, and a Post-Closure Plan will be prepared and submitted for approval by the Executive Secretary prior to implementation.

2. FACILITY DESCRIPTION

2.1. Facility Function and Location

The facility is located at 2450 South 800 West, South Salt Lake City, Utah 84119. The site includes an office area, warehouses, transferring equipment, above-ground tanks, tanker & package trucks, along with ancillary equipment. The surrounding land is zoned and permitted for light industrial use. The facility is to be used as a used oil processing and transferring facility from bulk tanker trucks and package trucks to above ground tanks and storage of drums and totes in a warehouse. The facility will also be used for processing used oil by filtration.

2.2. Products

At this site, Emerald will transfer and store used oil, antifreeze, mixed fuels, oil filters, and other materials generated in the automobile industry and other industries which generate used lubrication oil.

Closure plan 2450 south 800 west.doc



Closure Plan

Last printed: 9/8/04

2.3. Emerald Permitted Units

The following sections describe the permitted units at the Emerald facility. Those units, as described in section one above, include, but may not be limited to, bulk tank trucks, package trucks, box trailer, bulk tanks, warehouse, and loading areas. The arrangement of those units and layout of the facility is shown in Figure 2-1, Facility Layout Diagram. The following is a description of major units at the facility.

2.3.1 Bulk Tanker Truck

Bulk tanker trucks will be used to pick up used oil from various generators and transport the product to the processing facility. Used oil will be held in the tanker trucks for a period of less than 24hrs. Tanker trucks will also be used at times to transfer used oil that has been collected outside Utah and from rail cars to this processing facility or end users.

2.3.1.1 Physical Description

Tanker trucks are certified to meet 49 CFR 180.405 Subpart E Qualifications of Cargo Tanks for Transportation of Hazardous Materials, 49 CFR 180.407 Subpart E Requirements for Tests and Inspections of Specification Cargo Tanks.

2.3.1.2 Maximum Inventory

There will be no inventory of used oil stored in Tanker Trucks. All used oil will be transferred into the facility tanks for storage exceeding 24hrs. Empty trucks will be parked at a secured location within the facility for overnight parking.

2.3.2 Package Truck

Package trucks will be used to pick up used oil from various generators and transport the product to this facility for processing or transferring to an approved recycling facility. Used oil will be held in the package trucks for a period of less than 24hrs. Package trucks will also be used at times to transfer used oil that has been collected outside Utah.



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2.3.2.1 Physical Description

Package trucks will be used to transport used oil in non-bulk containers (i.e. drums and totes).

2.3.2.2 Maximum Inventory

The size of the package truck will vary, but should be approximately 24 feet in length. All used oil in containers will be stored in the package truck for no more than 24 hours.

2.3.3 Box Trailer

Box trailers will be used to pick up the used oil in non-bulk containers or totes from various generators and transport the product to the processing facility.

2.3.3.1 Physical Description

Box Trailer, similar to package trucks, will be used to transport used oil in non-bulk containers (i.e. drums and totes).

2.3.3.2 Maximum Inventory

There will be a maximum of one box trailer being utilized for storage and/ or collection at any time. The size of the trailer will vary, but should be approximately 48 feet in length.

2.3.4 Bulk Tanks

Bulk tanks will be used to store used oil within the concrete secondary containment area.

2.3.4.1 Physical Description

Each tank is constructed of rolled steel with welded seams. Each tank has a manway for access and a sight tube for checking the level of material in tank.

2.3.4.2 Maximum Inventory



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Bulk tanks range in size from 4,000 gallons to 10,300 gallons. The total bulk tank storage capacity is 142,300 gallons.

2.3.5 Warehouse

The warehouse will be used to store used oil, used oil filters, mixed fuels, spent antifreeze, new antifreeze, and various other items that have been collected from generators or that will be delivered or sold to customers.

2.3.5.1 Physical Description

The warehouse is approximately 8,000 square feet constructed of concrete floor and brick walls. The warehouse will store drums and totes of various materials.

2.3.5.2 Maximum Inventory

The warehouse can store up to a maximum of 7,150 gallons of used oil.

2.3.6 Bulk Loading Area

The bulk loading area consists of a bermed concrete pad running the length of the used oil tank farm.

2.3.6.1 Physical Description

The loading area is constructed of concrete with reinforced rebar. It is positioned next to the used oil tank farm containment wall.

2.3.7 Processing Equipment

The processing equipment will include, filtration unit(s), pump(s), and hoses.

2.3.7.1 Physical Description

The processing equipment will be located within the secondary containment area of Tank Farm #1. The area shall be managed under general housekeeping rules.



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3 Closure Objectives

The following describes the closure performance standard for the permitted units and site.

3.1 Closure Performance Standard

The permitted units (and any other equipment and areas at the site used for the storage, processing, or transferring of used oil) and site will be closed in a manner that complies with the performance standards contained in R315-15-11. The objectives of the program are as follows:

- Minimize the need for further maintenance.
- Control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of used oil, used oil constituents, leachate, contaminated run-off, or used oil decomposition products to the ground, surface water, groundwater, or to the atmosphere.

Final closure of the permitted units is intended to accomplish the goals of the closure performance standard noted above by:

- Removing and/or decontaminating all remaining containers, tanks, equipment, asphalt base, structures, soil, groundwater or other material containing or contaminated with used oil or used oil residues associated with the permitted units and site.
- Performing confirmation sampling, as necessary, to assess the removal or destruction of the used oil and used oil constituents at the permitted units and site.

3.2 Historical Constituents of Concern

Emerald has reviewed historical data to characterize used oil that it plans to deliver or have delivered to the facility. Based upon this information, constituents of concern have been identified by evaluating underlying constituents for materials defined as used oil. Table 3-1 (Historical Constituents of Concern in Used Oil) provides a summary of the applicable underlying constituents. In the event that used oil is delivered to the facility



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and later proven to be hazardous waste through further testing, Emerald will either return the used oil to the generator or dispose of the hazardous waste according to state and federal regulations.

As discussed in Section 2 (Facility Description), all permitted units will hold or process used oil. The constituents of concern for the permitted units are shown in Table 3-2 (Constituents of Concern in used oil). The test methods that will be used to analyze samples for constituents of concern are tabulated in Table 3-3 (Analytical Methods). The most appropriate EPA approved analytical method at the time of closure, as determined by the Executive Secretary of the Solid and Hazardous Waste Control Board, will be used.

3.3 Clean Closure Levels

All used oil, used oil residues, or equipment, bases, liners, soils, groundwater, or other materials contaminated with used oil or used oil residue will be removed or decontaminated according to the most recent EPA and state or local standards.

3.4 Contingencies for Soil

Sampling will be conducted in accordance to the site plan submitted to and approved by the Executive Secretary of the Solid and Hazardous Waste Control Board to characterize the area and vertical extent of possible contamination at and/or released from the unit(s) being closed and to confirm the effectiveness of closure activities. Knowledge of past management practices at Emerald will help determine the most appropriate amount and type of sampling. Sampling details are discussed under section 4 below.

4 CLOSURE ACTIVITIES

This section addresses activities that will be completed during closure of the permitted units. The following activities are described for each type of unit or system:

- Removal of used oil inventory
- Decontamination
- Confirmation of clean closure
- Contingencies



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- Final disposition of material and units

Sampling and analysis activities specified in this section will be performed in accordance with Appendix A, "Sampling and Analysis Plan" at the time of closure. Emerald Services, Inc. will submit a site-specific sampling and analysis plan at the time of closure to the Executive Secretary of the Solid and Hazardous Waste Control Board for approval.

The purpose of this Closure Plan is to achieve clean closure of the permitted units. No contaminated structures or equipment will remain on site.

4.1 Health and Safety

Prior to conducting any fieldwork for the implementation of this Closure Plan, a site-specific Health and Safety Plan (HASP) will be prepared in accordance with *29 CFR 1910.120*. The HASP will describe the health and safety requirements, responsibilities, and training requirements that will apply to personnel implementing the Closure Plan. It will also describe the potential hazards present during the field work, emergency response procedures, the minimum personal protective control measures, establishment of work zones, confined space entry procedures, and decontamination procedures. The HASP will also address the requirements for ambient air monitoring by specifying the PID/FID levels at which respirators will be donned. The HASP will be made available for review by appropriate agencies.

4.2 Removal of Used Oil Inventory

The objective is to remove all used oil and send it to a permitted processor/re-refiner (Emerald's Seattle facility, if possible). Each step is described below including general sequence, removal procedures, estimates of volume, staging and containerization of wastes, equipment used, and preparation for transportation off-site.

4.2.1 General Sequence

Emerald will remove all used oil inventory in a sequenced approach. All equipment will be transported from the site.

- All inventory and residual wastes will be transferred into a railcar, box trailer, or tanker truck for transport.



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- All transport vehicles will be sent to Emerald's Seattle facility for cleaning, or to another cleaning facility approved by the Executive Secretary.
- All inventory of all PPE (personal protective equipment) or cleanup materials will be transported off-site for disposal at Emerald's Seattle facility, or to another disposal facility approved by the Executive Secretary.

The basis for determining the maximum waste inventory is described in Section 2 (Facility Description). The maximum facility inventory is as follows:

Tank Farm #1 Used Oil	Gallage
3 x 10,300 gallons	30,900 gallons
10 x 8,400 gallons	84,000 gallons
3 x 7,400 gallons	22,200 gallons
1 x 5,500 gallons	5,500 gallons
Total Volume	142,600 gallons
Warehouse Non-Bulk Storage	
80 x 55 gallon drums	4,400 gallons
10 x 275 gallon totes	2,750 gallons
Total Volume	7,150 gallons

4.2.2 Final Disposition for Tank Systems

All permitted units will be decommissioned and left onsite or removed from the facility at closure and returned to the owner after they are decommissioned.

4.2.3 Containment Decontamination

The containment equipment will be visually inspected to identify any cracks or other openings. All containment equipment will be cleaned and decontaminated onsite.

4.3 Soil and Groundwater Sampling to Demonstrate Clean Closure

Emerald will demonstrate whether soils meet closure standards by direct soil sampling and analysis. If groundwater is encountered during any excavation



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or sampling, groundwater will also be sampled and analyzed. Emerald will analyze all samples for Constituents of Concern as listed in Table 3-2 plus other parameters deemed to be of concern by the Executive Secretary of the Solid and Hazardous Waste Control Board at the time of closure. Emerald will conduct bias sampling for this demonstration in accordance with the remediation plan submitted to and approved by the Executive Secretary of the Solid and Hazardous Waste Control Board.

Bias sampling focuses on likely areas of contamination, including, but not limited to:

1. Any other units (such as ancillary pipes) that may be in contact with soil;
2. Load or unload areas;
3. Storage units with underlying pavements or asphalt that appears to be cracked, broken, heavily stained, or the site of major past repairs;
4. Areas receiving runoff or discharge from used oil management units, such as a ditch, a swale, or the discharge point down gradient from a pipe; and
5. Groundwater, if encountered, during any excavation or sampling.

To estimate the number of bias samples for the closure cost estimate, the number of transferring areas within used oil management areas at the facility will be counted. That number will be added to an estimate of the number of significant cracks or past repairs in concrete and spills that may have occurred over the life of the facility. That total is the number of bias samples used for the purpose of the closure cost estimate. Analyses of each sample will be conducted for a suite of analytes (e.g., VOCs, SVOCs, total metals), and the closure cost estimate reflects this amount of analysis.

4.4 Procedure in event Contamination is Detected

If contamination is detected above cleanup levels, the following steps will be taken. Emerald Services, Inc. will submit a remediation plan to the Executive Secretary of the Solid and Hazardous Waste Control Board for approval. The remediation plan will include, at a minimum, a description on how Emerald will:

1. Characterize and evaluate the extent of contamination at the site.



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2. Remove or remediate soil that has contamination above the cleanup levels followed by confirmation sampling to ensure clean closure standards are met.
3. Sample and analyze groundwater, if encountered, during excavation of contaminated soil, to verify compliance with clean up standard.
4. Reanalyze soils of the entire area represented by the sample that has contamination above the cleanup levels using other samples taken within the area.
5. If further contamination beyond that covered by the remediation plan is encountered in the soil or groundwater, Emerald Services, Inc. will submit an amended remediation plan for approval to the Executive Secretary of the Solid and Hazardous Waste Control Board which addresses the areas of concern.

Emerald will sample and analyze closing units for the number of samples and for the constituents as described in Appendix A.

5. CLOSURE CERTIFICATION

In accordance with R315-15-11.4 of the Utah administrative code, within 60 days, of completion of final closure, Emerald's owner must submit to the Executive Secretary, by registered mail, certification that the used oil management facility, has been closed in accordance with the specifications of the approved closure plan and the sampling and remediation plans approved by the Executive Secretary of the Solid and Hazardous Waste Control Board as part of closure. The certification must be signed by Emerald's owner and by an independent qualified registered professional engineer.

Emerald's owner must make the following certification:

I certify under penalty of the law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that



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there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Activities of the independent qualified registered professional engineer shall include, but not be limited to, field observation and review of records of the following:

1. Sampling procedures;
2. Locations of soil sampling and groundwater sampling, if necessary, to ensure locations sampled were as specified in the sampling and analysis plan;
3. Sample labeling and handling, including chain-of-custody procedures;
4. Tank decontamination procedures to ensure that closure plan requirements for decontamination and rinsate management were followed and tanks were adequately cleaned; and
5. Procedures to achieve a "clean debris surface" were as specified in 40 CFR § 268.45, Table 1, for metal and asphalt surfaces.

6. CLOSURE SCHEDULE

The following provides information on the time allowed for closure and provisions for any necessary time extensions.

a. Time Allowed for Closure

Closure activities will begin a maximum of 90 days after receipt of the final shipment of used oil or some other date determined by the Executive Secretary. Emerald will complete closure activities in accordance with the approved closure plan, including sampling and remediation plans approved by the Executive Secretary of the Solid and Hazardous Waste Control Board as part of closure. Emerald will submit closure certification to the Executive Secretary within 60 days following completion of closure activities and final facility closure.



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7. CLOSURE COST

b. Closure Cost Estimate

The information presented in this section for implementing the Closure Plan has been prepared in accordance with R315-15-11.2. The following assumptions were used in developing the cost estimate:

- A third party will be used to conduct closure activities.
- The cost estimate does not incorporate any salvage value.
- Oversight and closure certification will be conducted by an independent, qualified, registered professional engineer.

Costs for transportation and disposal of used oil, including existing inventory, and contaminated wash water (rinsate) are based on contract prices and recent invoices from treatment, storage, and disposal facilities that Emerald is currently using. At the time of implementation of this Closure Plan, Emerald reserves the option to use any other appropriately permitted facility for disposal or recycling of wastes. The cost estimate for closure of permitted used oil transfer facility units at the Emerald facility is presented as Appendix B, along with a more detailed breakdown of the cost estimates.

c. Financial Assurance for Closure

Emerald Services, Incorporated will meet the financial assurance requirements specified under R315-15-12 Reclamation Surety, by continuously maintaining a financial assurance mechanism for closure with the Department of Environmental Quality. The amount of mechanism must be consistent with closure cost estimate provided in Appendix B of this Closure Plan and will be increased annually, if necessary due to inflation. Emerald must demonstrate continuous compliance by providing documentation of financial assurance, as required by R315-15-12 in at least the amount of the current cost estimate.

Appendix A

Sampling and Analysis Plan

The number of bias samples to be required is based on units 1) ancillary pipes) that may be in contact with soil, 2) load or unload areas, 3) storage units with underlying pavements or asphalt that appears to be cracked, broken, heavily stained, or the site of major past repairs, 4) areas receiving runoff or discharge from used oil management units, such as a ditch, a swale, or the discharge point down gradient from a pipe, and 5) groundwater that maybe encountered during any excavation.

Table A-1. Estimated Sampling and Analysis of Closing Units

Processing/ Transfer Facility Area	Area, (ft ²)	Estimated number of biased samples (aver. 1/294 ft ²)
Load/Unload Area	1800	6
Tank Farm Area	4465	12
Warehouse Storage Area	2000	7
Groundwater, if necessary		5

Appendix B

Closure Cost Estimate

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UTAH DIVISION OF
SOIL & HAZARDOUS WASTE

Activity	Qty	Units	Previous Year Unit Cost	IPD Unit Cost Adju stme nt*	Applied Cost	Total Costs
<u>Prepare HASP</u>	1	document	\$1000.00	\$67.66	\$1067.66	\$1067.66
<u>Used Oil Inventory Removal</u>						
<u>Tank Storage (Box Trailer and Tank Trucks)</u>						
Inventory Removal Activities (labor)	40	Hours	\$31.73	\$0.68	\$32.41	\$1,296.40
Supervisor (10% of activity labor)	4.0	Hours	\$79.32	\$1.69	\$81.01	\$324.04
Transportation and Recycling (Offsite)	149,750	Gallons	\$0.08	\$0.01	\$0.08	\$11,980.00
Subtotal						\$13,600.44
<u>Tank System Decontamination</u>						
Tank(s) Cleaning by contractor	Bid	17 Tanks	\$13,055.00	1.5%	\$195.83	\$13,250.83
Misc. Labor Activities	10	Hours	\$31.73	\$0.68	\$32.40	\$317.30
Supervisor (10% of activity labor)	8	Hours	\$94.00	\$1.69	\$81.01	\$752.00
Subtotal						\$14,320.13
<u>Asphalt/Soil Core Verification</u>						
Staff Engineer/Geologist	20	Hours	\$77.00	1.5%	\$78.15	\$1,563.10
OVM	2	Days	\$85.00	1.5%	\$86.28	\$172.56
Equipment Rental	2	Days	\$25.00	1.5%	\$25.38	\$50.76
Driller	1	Bid	\$2,565.00	1.5%	\$38.48	\$2,603.48
Laboratory Analysis	30	Sample	\$9,012.00	1.5%	\$135.18	\$9,147.18
<u>Report Preparation</u>						
Staff Geologist	16	Hours	\$77.00	1.5%	\$78.15	\$1,250.40

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UTAH DIVISION OF
SOLID & HAZARDOUS WASTE

Activity	Qty	Units	Previous Year Unit Cost	IPD Unit Cost Adju stme nt*	Adj'd Unit Cost	Total Costs
Site Drafting	8	Hours	\$60.00	1.5%	\$60.90	\$487.20
Supervisor	2	Hours	\$79.32	1.5%	\$81.01	\$162.02
Engineer Review	2	Hours	\$125.00	1.5%	\$126.88	\$253.76
Clerical	2	Hours	\$45.00	1.5%	\$45.68	\$91.36
			Subtotal			\$15,781.82
10% Contingency						\$4,477.00
				Total		\$49,247.05

Activity	Qty	Units	Previous Year Unit Cost	IPD Unit Cost Adju stme nt*	Adj'd Unit Cost	Total Costs
<u>Prepare HASP</u>	1	document	\$1000.00	\$67.66	\$1067.66	\$1067.66
<u>Used Oil Inventory Removal</u>						
<u>Tank Storage (Box Trailer and Tank Trucks)</u>						
Inventory Removal Activities (labor)	40	Hours	\$31.73	\$0.68	\$32.41	\$1,296.40
Supervisor (10% of activity labor)	4.0	Hours	\$79.32	\$1.69	\$81.01	\$324.04
Transportation and Recycling (Offsite)	149,750	Gallons	\$0.08	\$0.01	\$0.08	\$11,980.00
Subtotal						\$13,600.44
<u>Tank System Decontamination</u>						
Tank(s) Cleaning by contractor	Bid	17 Tanks	\$7,932.70	1.5%	\$0.17	\$8,051.69
Misc. Labor Activities	10	Hours	\$31.73	\$0.68	\$32.40	\$317.30
Supervisor (10% of activity labor)	8	Hours	\$94.00	\$1.69	\$81.01	\$752.00
Subtotal						\$9,120.99
<u>Asphalt/Soil Core Verification</u>						
Staff Engineer/Geologist	20	Hours	\$77.00	1.5%	\$78.15	\$1,563.10
OVM	2	Days	\$85.00	1.5%	\$86.28	\$172.56
Equipment Rental	2	Days	\$25.00	1.5%	\$25.38	\$50.76
Driller	1	Bid	\$2,565.00	1.5%	\$2,603.48	\$2,603.48
Laboratory Analysis	30	Sample	\$9,012.00	1.5%	\$9,147.18	\$9,147.18
<u>Report Preparation</u>						
Staff Geologist	16	Hours	\$77.00	1.5%	\$78.15	\$1,250.40

Activity	Qty	Units	Previous Year Unit Cost	IPD Unit Cost Adju stme nt*	Adj'd Unit Cost	Total Costs
Site Drafting	8	Hours	\$60.00	1.5%	\$60.90	\$487.20
Supervisor	2	Hours	\$79.32	1.5%	\$81.01	\$162.02
Engineer Review	2	Hours	\$125.00	1.5%	\$126.88	\$253.76
Clerical	2	Hours	\$45.00	1.5%	\$45.68	\$91.36
Subtotal						\$15,781.82
10% Contingency						\$3,957.91
Total						\$39,570.91

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Appendix C

Figures

Appendix D

Tables

Table 2-1 Storage System Physical Description			
Storage Unit	Tank Identification	Maximum Capacity (gal)	Unit Description
<i>Tanks</i>	1-17	142,600	Used Oil Tanks
<i>Warehouse</i>	Various	7,150	Non-bulk container storage

Table 2-2
Secondary Containment Areas

Secondary Containment Area	Management Practice
Tank Farm #1	Bulk loading
Warehouse	Bulk loading

Table 2-3
Secondary Containment Design Data

Secondary Containment Area	Area (ft²)	Dimensions	Height (inches)
Load /Unload Area (Total Containment Area)	1880	235' x 8'	
Tank Farm #1	4465	235' x 19'	12"

Table 3-1 Historical Constituents of Concern in Used Oil		
Waste Material	Constituent of Concern	CAS Number
Used oil	N/A	N/A
D004	Arsenic (As)	7440-38-2
D006	Cadmium (Cd)	7440-43-9
D007	Chromium (Cr)	7440-47-3
D008	Lead (Pb)	7439-92-1
Toxic Organics		
D018	Benzene	71-43-2
D039	Tetrachloroethylene	127-18-4
D040	Trichloroethylene	79-01-6
Petroleum Hydrocarbons		
TRPH	Total Petroleum Hydrocarbons	N/A

Table 3-2
Constituents of Concern

<i>Volatile Organics</i>
1,1,1-Trichloroethane
Benzene
Ethylbenzene
Perchloroethylene (Tetrachloroethene)
Tetrachloroethylene
Toluene (methylbenzene)
Trichloroethylene
Xylenes (mixed isomers)
<i>Petroleum Hydrocarbons</i>
Total Petroleum Hydrocarbons
<i>Total Metals</i>
Arsenic
Cadmium
Chromium (total)
Lead

Table 3-3
Analytical Methods

Target Analyte ¹	Analytical Technique	SW-846 ²
Volatile Organics (VOC)	GC/MS for volatile organics	8260
Total Petroleum Hydrocarbons (TPH)	Hexane Extractable Media	1664
Metals (total)	Total metals by ICP	6010

Note:

1. These methods (or ASTM equivalent) will be used as needed to identify constituents of concern or waste characteristics.
2. The most recent (or equivalent) analytical method will be utilized.

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WASATCH ENVIRONMENTAL, INC.
ENVIRONMENTAL SCIENCE AND ENGINEERING

Mr. Jim Munnell
Emerald Services
9010 East Marginal Way, Suite 100
Seattle, Washington 98108

September 2, 2004
1608-3Bgeoprobeproposal.wpd

SUBJECT: Cost Estimate for Soil and Groundwater Sampling
Emerald Services Facility
2450 South 800 West
South Salt Lake, Utah

In accordance with your request, we have prepared this cost estimate for conducting soil and groundwater sampling activities at the subject property. It is our understanding that these sampling activities are necessary in order to receive closure of the used oil processing and its units at the Emerald Services, Inc., facility located in South Salt Lake, Utah.

For planning purposes, we are providing a cost estimate for 25 probe locations. Based on our experience in the area of the subject site combined with additional documentation regarding nearby sites, groundwater in the vicinity of the subject property is expected to occur within five feet below the surface. Accordingly, direct push borings would be advanced to approximately four feet below ground surface (bgs). The samples would be collected continuously and logged according to soil type (Unified Soil Classification), color, moisture content, and screened in the field with a portable organic vapor monitor.

We would install temporary micropurge implants and collect groundwater samples using a peristaltic pump at five of the twenty-five soil probe locations. These borings would be completed to approximately 12 feet bgs. The groundwater samples would be transferred to appropriate sample containers and immediately placed in iced coolers. The soil and groundwater samples would be transferred under chain of custody documentation to a Utah certified laboratory for analyses.

This cost estimate assumes that five groundwater samples and one soil sample from each soil probe location (25 locations) would be submitted for analyses. Soil and groundwater samples would be analyzed for Total Recoverable Petroleum Hydrocarbons (TRPH) using EPA Method 1664, Halogenated Volatile Organic Compounds (HVOCs), methyl tertiary-butyl ether (MTBE), benzene, toluene, ethylbenzene, xylenes, naphthalene (BTEXN), Total Petroleum Hydrocarbons (TPH) using EPA Method 8260B, and lead using EPA Method 6010B.

Standard turnaround time for laboratory analysis is seven to ten days and was used in the preparation of this cost estimate. Following receipt of laboratory data, a report would be issued presenting the laboratory data, a site map, boring logs, and a summary table of the analytical results.

The estimated cost to complete the outlined scope of work is presented in Table 1.

Our services consist of professional opinions and recommendations made in accordance with generally accepted geotechnical and environmental engineering principles and practices. This warranty is in lieu of all other warranties either expressed or implied. Work would be conducted on a time and materials basis.

Please acknowledge your acceptance of the scope of services and terms and conditions discussed herein by signing one copy of this letter and returning it to our office at your earliest convenience.

Should you have any questions, please do not hesitate to contact us.

Sincerely,

WASATCH ENVIRONMENTAL, INC.

Rebecca Studenka
Geologist

Julie Kilgore, Vice President
Environmental Manager

Copies: (1) Addressee

Accepted by: _____ Date: _____

**TABLE 1
COST ESTIMATE FOR
SOIL AND GROUNDWATER SAMPLING
EMERALD SERVICES FACILITY**

Preparations, Probing, Sampling

Staff Engineer/Geologist	20 hours	@ 77/hr	\$ 1,540.00
Mileage	25 miles	@ .45/mi	\$ 11.25
OVM	2 days	@ 85/day	\$ 170.00
Water Level Indicator	2 days	@ 25/day	\$ 50.00
Driller	1 Bid	@ 2565.00	\$ 2,565.00
			<u>\$ 4,336.25</u>

**Laboratory Analysis
(Groundwater Samples)**

TRPH EPA Method 1664	5	@ 41/ea	\$ 205.00
HVOCs, MBTEXN, & TPH EPA Method 8260B	5	@ 161/ea	\$ 805.00
Lead EPA Method 6010B	5	@ 30/ea	\$ 150.00
			<u>\$ 1,160.00</u>

**Laboratory Analysis
(Soil Samples)**

TRPH EPA Method 1664	25	@ 41/ea	\$ 1,025.00
HVOCs, MBTEXN, & TPH EPA Method 8260B	25	@ 161/ea	\$ 4,025.00
Lead EPA Method 6010B	25	@ 30/ea	\$ 750.00
			<u>\$ 5,800.00</u>

Report Preparation

Staff Engineer/Geologist	16 hrs	@ 77/hr	\$ 1,232.00
Site Measurements and Drafting	8 hrs	@ 60/hr	\$ 480.00
Principal Engineer Review	2 hrs	@ 125/hr	\$ 250.00
Clerical	2 hrs	@ 45/hr	\$ 90.00
		Subtotal	<u>\$ 2,052.00</u>

Total Cost Estimate \$13,348.25



Environmental Engineering Remediation
 Site Assessments
 UST & AST Installation
 Petroleum System Installation
 Monitoring & Testing

Bid Quotation

Project Title:	Former Petro Mark Facility
Date:	September 2, 2004
Issued To:	Emerald Services 9010 East Marginal Way, Suite 100 Seattle, Washington 98108 (206) 963-0370 Jim Munnell
Scope Requirements:	As requested we are submitting a price quote to complete the following scope of work; Clean 22 aboveground storage tanks at former Petro Mark facility located at 2450 South 800 West in Salt Lake City, Utah.
Document References:	
Scope of work:	<ul style="list-style-type: none"> • Clean inside of twenty-two ASTs located at the facility <p>This bid assumes the following numbers and capacities of tanks as given to us by Mr. Jim Munnell:</p> <ul style="list-style-type: none"> • 3-4 tanks, 10,000-gallon capacity • 10 tanks, 8,400-gallon capacity • 6 tanks, 4,000-5,500-gallon capacity
Other Conditions:	<p>This bid assumes tanks are empty. If product (>3" in tank) is discovered, an additional \$0.87/gallon for transport and disposal will be charged. If tank bottom solids are encountered, an additional cost of \$5.75/gallon will be charged.</p> <p>This bid assumes the removal of all tank manways will be performed by others. An additional cost of \$520.00 will be charged.</p>
Price:	<p>Price includes all of the scope of work above including but not limited to all materials labor and equipment to complete the work as required</p> <p style="text-align: right;">Total \$8,695.95</p> <p>Schedule:</p>
Deducts/ Alterations / Additions	Exclusions: <ul style="list-style-type: none"> • Price does not include the following; • Transport and disposal of product and/or sludge • The removal of tank manways
Terms & Conditions:	Net 15 days

SEP 02 2004 11:52 FR

1801 972 8459 TO 12068323059

P.06/07



**Environmental Engineering Remediation
Site Assessments
UST & AST Installation
Petroleum System Installation
Monitoring & Testing**

We look forward to working with you. Please call if you have any questions.
Sincerely,

Rebecca Studenka, Project Geologist

Accepted By: _____

Date
: _____

**TABLE 1
COST ESTIMATE FOR
CLEANING OUT ASTs
PETRO MARK FACILITY**

Project Management, Cleaning ASTs

Project Manager	8 hours @ 94/hr	\$ 752.00
Mileage	25 miles @ .45/mi	\$ 11.25
Tank Cleaning Contractor	1 Bid @ 7,932.70	<u>\$ 7,932.70</u>
	Total Cost Estimate	\$ 8,695.95



Environmental Engineering Remediation
 Site Assessments
 UST & AST Installation
 Petroleum System Installation
 Monitoring & Testing

Bid Quotation

Project Title:	Former Petro Mark Facility
Date:	June 14, 2004
Issued To:	Emerald Services 9010 East Marginal Way, Suite 100 Seattle, Washington 98108 (206) 963-0370 Jim Munnell
Scope Requirements:	As requested we are submitting a price quote to complete the following scope of work; Clean 26 aboveground storage tanks at former Petro Mark facility located at 2450 South 800 West in Salt Lake City, Utah.
Document References:	
Scope of work:	<ul style="list-style-type: none"> • Clean inside of twenty-six ASTs located at the facility <p>This bid assumes the following numbers and capacities of tanks as given to us by Mr. Jim Munnell:</p> <ul style="list-style-type: none"> • 3-4 tanks, 10,000-gallon capacity • 10 tanks, 8,400-gallon capacity • 12 tanks, 4,000-5,500-gallon capacity
Other Conditions:	<p>This bid assumes approximately 4,500 gallons of rinseate will be generated during the cleaning process. If additional rinseate is generated the cost for transport and disposal will be \$1.15/gallon.</p> <p>This bid assumes tanks are empty. If product (>3" in tank) is discovered, an additional \$0.87/gallon for transport and disposal will be charged.</p>
Price:	<p>Price includes all of the scope of work above including but not limited to all materials labor and equipment to complete the work as required</p> <p style="text-align: right;">Total \$15,598.25</p> <p>Schedule:</p>
Deducts/ Alterations / Additions	<p>Exclusions:</p> <ul style="list-style-type: none"> • Price does not include the following; • Transport and disposal of rinseate above 4,500 gallons • Transport and disposal of product
Terms & Conditions:	Net 15 days



**Environmental Engineering Remediation
Site Assessments
UST & AST Installation
Petroleum System Installation
Monitoring & Testing**

We look forward to working with you. Please call if you have any questions.
Sincerely,

Rebecca Studenka, Project Geologist

Accepted By: _____

Date: _____

**TABLE 1
COST ESTIMATE FOR
CLEANING OUT ASTs
PETRO MARK FACILITY**

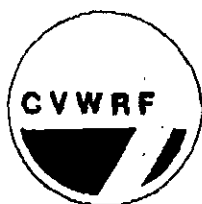
Project Management, Cleaning ASTs

Project Manager	8 hours @ 94/hr	\$ 752.00
Mileage	25 miles @ .45/mi	\$ 11.25
Tank Cleaning Contractor	1 Bid @ 14,835.00	\$14,835.00
Total Cost Estimate		\$15,598.25

APR-30-04 FRI 11:39 AM

FAX NO.

P. 02



Central Valley Water
Reclamation
Facility

**SIGNIFICANT INDUSTRIAL USER
WASTEWATER DISCHARGE CONTROL PERMIT**

Permit No. 1810-00-SSLCompany Name Emerald Services Inc

Division Name (if applicable) _____

Facility Address (street) 2450 South 800 West(city, state, zip) Salt Lake City, Utah 84119Mailing Address (street) 2450 South 800 West(city, state, zip) Salt Lake City, Utah 84119Primary SIC No. 5093Classification W-3Major Processes Generating Wastewater: Dewatering waste oil collected from
waste oil recycling containers.Applicable Categorical Regulation(s): 40 CFR Part N/A Sub-Part N/AEffective Date of Permit April 29, 2004 Expiration Date April 28, 2009

This permit is granted based on the application filed on April 23, 2004 and the representations, plans, specifications and other data submitted as supporting information.

The above named Industrial User is authorized to discharge industrial/non-domestic wastewater to the Central Valley Water Reclamation Facility (Central Valley) in accordance with the terms and conditions contained in this Wastewater Discharge Control Permit, Central Valley Pretreatment Ordinance and the General Pretreatment Regulations (40 CFR 403).

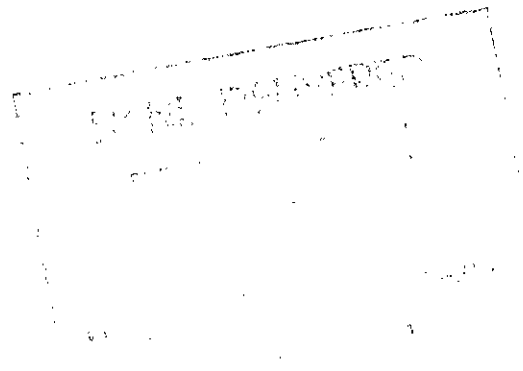
Signature _____

Title Industrial Wastewater Control Manager

Date _____



www.emeraldncw.com
1-888-832-3008



September 18, 2004

South Salt Lake City Police Department
2835 South Main Street
South Salt Lake City, Utah 84115

South Salt Lake City Fire Department
2600 South Main Street
South Salt Lake City, Utah 84115


Salt Lake Regional Hospital
1050 East South Temple
Salt Lake City, Utah 84102

Re: Emerald Services 2450 South 800 West South Salt Lake

Emerald Services, Inc. has made application to the State of Utah Department of Environmental Quality, Division of Solid and Hazardous Waste for the processing and storage of used oil. Attached is a facility map, contingency plan for the facility and material safety data sheet for used oil. The SPCC plan is onsite for your review. Please keep this information on hand in the event of an emergency.

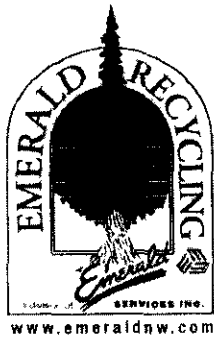
If you have any questions or if you would like to schedule a site tour please call 801-973-4131.

Sincerely,
Emerald Recycling



Jim Munnell
General Manager

Your Partner for Recycling and Environmental Services



September 21, 2004

Mr. David Wheeler
State of Utah
Department of Environmental Quality
Division of Solid and Hazardous Waste
P.O. Box 144880
Salt Lake City, Utah 84114-4880

Re: Processing Application Letter of Credit.

Dear Mr. Wheeler,

Emerald Service's Inc. has requested a separate "Irrevocable Letter of Credit" in the amount of \$49,247.05. The irrevocable letter of credit will be issued from:
U.S. Bank National Association
International Department, WWH-277
1420 5th Ave, 9th Floor
Seattle, WA 98101

The beneficiary shall be:
Executive Secretary
Utah Solid and Hazardous Waste Control Board
288 North 1460 West
Salt Lake City, Utah 84114

I expect the letter of credit to be completed within the next three days.

Sincerely,
Emerald Services, Inc.

Jim Munnell
General Manager

Sent via e-mail
Hard Copy to Follow